March 26, 2025

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

RE: Ex parte for WC Docket Nos. 10-90 and 23-328; GN Docket No. 25-133

Dear Ms. Dortch:

On March 26, the undersigned from Vantage Point Solutions met virtually with the five Commission team members noted below who were in their L Street location on two universal service ("USF") topics and the current Delete, Delete, Delete proceeding.

The first topic discussed in the *ex parte* session included the current imbalance of rate benchmarks for the recently adopted Alaska Connect Fund ("ACF") for the subject carriers. The Bureau staff explained that the current level of compliance from Alaska carriers and recently awarded 30% increase over prior funding for the new Alaska Connect Fund drove the current conclusion to maintain each ACF carrier at their existing rate benchmark.

I also mentioned that ARCC ACF work efforts, in conjunction with another stakeholder, have already started to address what happens on the wireline side of ACF for the shift from the transitional phase to the fixed phase. In the conversation, I indicated our current work plan recognizes the conclusions staff had offered in footnote 192 of the ACF Order regarding rate-of-return versus model based mechanisms.

On a lower forty-eight USF issue, I mentioned that several high-cost carriers are in the early stages of researching and drafting proposed revisions to current high-cost support mechanisms. The forecasted challenges of increased capacity and supply chain challenges strain current levels of support. In some cases, it may be necessary to reflect higher costs of construction in difficult soil conditions and maintaining facilities in "frontier" regions of the western US as we move forward.

In the matter of Delete, Delete, Delete, we are pleased, as noted on page 1 of the Public Notice, to provide "*input on identifying FCC rules for the purpose of alleviating unnecessary regulatory burdens*." We complimented the staff for their upcoming labor in the docket and expressed our appreciation for the opportunity to improve the rules in place.

We reviewed some basic logistical aspects of this new docket approach. VPS will be filing in the docket a recommendation for the Commission's review, building on recent Commission action.

Thank you for your attention to this correspondence. Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS.

Sincerely,

s/JHS via ECFS

Jeffry H. Smith
VP of Public Policy and Advocacy

Copy to Trent Harkrader
AJ Burton
Jesse Jachman
Audra Hale-Maddox
Molly O'Conor